Point Inventory Course
Questions and Answers

Does EPA list VOC and PM HAPs that should be included in the QA criteria listed on page 10?
No we do not maintain such a list. It was indicated that VOC should be greater than or equal than VOC HAPs and PM-10 should be greater than or equal to PM-HAPs. This was provided as an example of an integrated CAP / HAP inventory. We have seen (in the 2008 cycle) some gross errors such as more benzene than VOC. Looking for/correcting such errors would be a good start. You could also create your own check (we don't have one—this is not a QA check being done in EIS at this time) by taking the list of VOC HAPs that WV put together and summing them and comparing to VOC at each process. West Virginia's list is at:
http://www.dep.wv.gov/daq/Air%20Toxics/Pages/HazardousAirPollutants(HAPs)List.aspx. PM HAPs are complicated since there are so many semi volatile HAP that could be in either gaseous or particulate state. If this is something you would like to check on your own, you could just take the metals (chromium, nickel, arsenic, lead, manganese, selenium, antimony, beryllium, cadmium, cobalt, mercury) and sum them to make sure they are less than PM10-PRI. This is not a QA check in EIS at this time.

You had raised the concern for double counting rail emissions on Slide 38. Rail Yards also called switchyards are reported as points, but line haul (rail lines) can be reported as shape file based submittals in nonpoint. Can we report switch yards using a shape file and not report the switchyard as a point source?
You can report switchyards in nonpoint or point. Since it isn't rail lines, it is reported without a shape. You should make sure the county you are reporting to does not already have a rail facility there (search all facility for that county, and look for facility type=rail)

What does LTO stand for?
Landing and takeoffs. It is the measure of activity for airport processes.

It is my recollection that the OR on slide 11 means only one of the IDs can be in the staging tables. Is this still the case?
We recommend you use EITHER the Agency ids or EIS ids. If you use both, there is a possibility of making an error by not being consistent across all of the staging tables and all of the records within the staging table.

state. If this is something you would like to check on your own, you could just take the metals (chromium, nickel, arsenic, lead, manganese, selenium, antimony, beryllium, cadmium, cobalt, mercury) and sum them to make sure they are less than PM10-PRI. This is not a QA check in EIS at this time.

Slide 8 indicated a relationship between emissions and controls. Does EPA expect controls efficiency estimates to be reported for CEMS, TANKS and/or Stack Test – After Control emission methods, even though the calculated emission values already compensate for the controls? For example, does EPA need this information to evaluate what if scenarios that involve a control system failure.
Controls are part of the facility inventory (they are not inventory year specific) and they are required to be reported where present (AERR) at either the unit or process level. EPA needs this information to assess future year scenarios, incremental costs, etc-- they are an important part of a cost benefit analysis. A complete submittal for controls would include populating (1) the control approach table which includes the capture efficiency and effectiveness (not a device efficiency thing but a measure of percent utilization of the approach) (2) the control measure table in which you specify the control ids that make up the control measures associated with the control approach (so there could be more than one like an SCR and a baghouse) and 3) the control efficiency of the combination of all devices that comprise the control approach for each pollutant. The EIS system won't necessarily reject the control approach if something is missing, but not having a complete submittal will cause issues in being able to use the information. Please therefore provide a complete submittal of control information

Since our particulate HAPS plus lead should sum less than or equal to our PM-10, can we assume that particulate HAP emission factors from WebFire represent HAP particulate matter less than 10 microns in diameter or less?
No, possibly there are inconsistencies in the EFs (done at different times) such that you will find a HAP factor (for a particulate HAP) that is greater than a PM-10 factor. My examples were attempting to point out gross errors that we did see in a previous reporting cycle that led us to believe there may have been a HAP outlier or a PM10 underestimate. PM HAPs are complicated since there are so many semi volatile HAP that could be in either gaseous or particulate state. If this is something you would like to check on your own, you could just take the metals (chromium, nickel, arsenic, lead, manganese, selenium, antimony, beryllium, cadmium, cobalt, mercury) and sum them to make sure they are less than PM10-PRI. This is not a QA check in EIS at this time.

Are you saying that you don't want us to report uncontrolled emissions?
There are no data elements for uncontrolled emissions. "Total Emissions" (in the Emissions table) represents what is coming out of the process, AFTER controls. Since control information is required, we (or anyone) can compute uncontrolled emissions from your Total emissions and the capture, control and effectiveness efficiencies.

How do you augment PMs? Do you have fractions of PM25-FIL, PM10-FIL to share?
The procedure will be documented shortly: (1) the 2008 NEI v2 documentation and (2) a paper to be presented at the NEI Conference this August by Roy Huntley.

So would you class the EIS as dynamic and the NEI as static?
That is absolutely correct. For example, lets say we have released the 2008 v2 and the next day, the facility window is open, and you decide to change an SCC code. EIS has dynamically changed, but the 2008 NEI v2 data that we put out on our CHIEF website (browser and downloadable summary files) will have SCC code that was there at the time we took that static snapshot and ran/downloaded the reports.

Are there any other speciated chemicals for certain reporting years (e.g. o-, p-, or m-xylene)?
There are numerous HAPs that belong to HAP Pollutant groups The best way to check the chemicals that are part of groups is to look at the code tables- the column that says pollutant category name. All pollutants that have either speciated components or more specific compounds that belong to the group will be in the same pollutant category. Here is a list of them:
(1) Polycyclic Organic Matter
(2) Glycol Ethers
(3) Xylenes
(4) Cresols
(5) Dioxins/Furans
(6) Polychlorinated Biphenyls
(7) Radionuclides
(8) Chromium compounds
(9) Fine Mineral Fibers
(10) Cresol/Cresylic Acid (Mixed Isomers)
(11) Nickel compounds
(12) Xylenes (Mixed Isomers)

How do you indicate in the Point Inventory that an existing process ended in mid year of a reporting year? Actually it is specified in the Facility Inventory. You cannot specify the month-day-year of when a process is no longer active. You can specify a "Last Inventory Year". Unlike the status code of a facility or unit, if you specify a last inventory year of 2011, you may still report emissions for that inventory year.

States collect data ahead of the reporting deadline, so we will not be able to use the "new" factors. When will WebFIRE/AP-42 be updated? We realize that this is a problem. If you have a major, or high risk facility in which these factors could be applied to improve upon your estimates, you can update your emissions closer to the date that the window closes (Dec 31, 2012) or during the comment period when the draft 2011 is released.

Will the EIS be converted to Access 2007 at some point? If at some time we need to update the Bridge Tool, we will be able to also update the Access version.

Will the updated PM factors ever be put in AP-42 or FIRE? Unfortunately that portion of the program did not receive funding for this fiscal year. When funding is available the updates will be made. This is why we are trying to make these factors available to you in an alternate way.

Is there any way in CDX to directly cross check or audit a facility's Point Inventory data with TRI air release data for a certain year? We don't think this is possible since TRI doesn't have EIS IDs and we only have a limited number of TRI ids, though we are working to improve that. To the extent we can help provide (outside the system) assistance to provide you data, let us know. We will look into a more automated approach.

So does this mean that there is no way to report total PM that includes particulates >PM10 anymore? That is correct.

Can we get the QA check code including the POM/PAH speciation so that we can better report and query out double counting from our data? For Example is 4,6-Dinitro-o-cresol included in Cresol double counting concerns? We will be posting a file with all of the new QA checks by 6/1. That one example is actually not a cresol but the first type of HAP (a specific individual compound).

Is any documentation available re: the various 2008 data sets that EPA has developed? (e.g., (2008EPA_MATS vs. 2008EPA_MMS, vs. "EIAG all in NP", etc. etc.) Yes, the initial draft of the 2008 NEI v2 documentation which will be posted shortly after the 2008 NEI v2 release will have tables describing the datasets and the selection hierarchy.

Can a report be generated for a specific year comparing facility level emissions among various datasets? We are planning on a comparison report in the future.

If no PMCON emitted, should it be left out or reported as zero? Report as zero; if it is not zero our PM Aug routine will potentially add it. A null means not reported; while a zero is actually zero emissions.

If airports are now a single point source, what single aircraft engine type should be selected to represent hundreds of aircraft at the airport?
There are detailed aircraft engine type codes by aircraft make (e.g., Boeing 767) and engine type (e.g. Pratt & Whitney PW4x62). These details are critical if you plan to run the FAA's emission estimation model. If you do not have this detail, and are using emission factors and LTO to estimate emissions without the model, then you would use the generic aircraft engine type codes (99990* in the code list) for each aircraft by SCC (e.g., commercial, military, general aviation, etc).. If you do not wish to calculate emissions at all, you can accept EPA's estimates.

Why was the Facility Geographic Coordinates table not highlighted? The Facility Geographic Coordinates table is not used in Point reporting. When you are reporting emissions, any additional fields in the tables that are not required or optional will be ignored (e.g., SCC, Facility name, etc.). These fields are used in a Facility Inventory submittal

There are some pollutant codes in my inventory that are not in the tables (Toxics, et al.) why are they critical errors and why can't they just be ignored. I have to edit out every one of these in order to submit a valid inventory. Because the emissions component is a total replacement, they are accepted and rejected as a group. If you have an invalid pollutant code in the group, then the whole group in rejected. Unfortunately, this is a system design. When pulling from your system,

can you select what codes should be included in your export? If you could, it would alleviate having to eliminate those pollutant codes which would cause the group to be rejected.

EPA plans to gap fill the HAPs where not submitted voluntarily. When will EPA be adding this to the AERR so we have federal authority and require this to be submitted by facilities? Then EPA won't have to worry so much about gap filling. Currently there are no plans to add HAPs to the AERR.

We have facilities that deliberately report 39999 SCCs for fear of the competitors learning more about their processes. There are numerous SCCs such as fuel combustion units that are very generic and do not describe information about an emissions process. For noncombustion processes there are many general SCCs that could be used that would be better than 39999.

The page 7 slide: May Include throughput? Throughput is listed in the AERR as a required element. IF pollutant totals are submitted and throughput is not, anyone knowledgeable can apply various emission factors to get an estimate of throughput anyway.   True. Throughput is only required for onroad emissions reporting. The AERR is very out of dated and is currently under review for revision.

If throughput is not a required element for point sources, how would we avoid double counting of combustion emissions? With throughput it is relatively easy to subtract industrial sources before calculating area industrial sources..... Without it would lead to some difficulties doing this. It is the State's responsibility to make sure that the point/nonpoint subtraction is done prior to submission. If it is not done, then it will be double counted. Since throughputs are usually not reported to us, we do not have the necessary knowledge to do this type of calculation.

When will the lead levels be adjusted down to .5 tpy for the AERR? The .5 tpy is required for SIPs, but the AERR will not be updated on this point prior to 12/2012. Many States reported using the .5tpy threshold in 2008.

Is there any sort of summary of what each data set is and isn't? I have had trouble deciding what data set to use. For the 2008 EPA datasets, see the 2008 documentation on the CHIEF website (http://www.epa.gov/ttn/chief/net/2008neiv2/2008_neiv2_tsd_draft.pdf). There is a section which explains the different datasets and what they contain. See Table 8 for the point source data sets and Table 9 for the nonpoint datasets.